

# **EXHIBIT**

# **J**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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*This document relates to:*

*Burnett, et al. v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN)

**DECLARATION OF JOHN CUCCINELLO**

I, JOHN CUCCINELLO, hereby declare under penalty of perjury:

1. I am 39 years old and reside in Maplewood, New Jersey.
2. I am the stepson of William J. McGovern, a New York City Firefighter who was killed in the September 11, 2001 terrorist attacks on the World Trade Center in New York.
3. My mother and father were divorced when I was 4 or 5 years old. After their divorce, I never again resided with my biological father and he and I never developed a father/son relationship.
4. When I was 8 years old in 1987, my mother married William J. McGovern and he became my stepfather. We moved into his condominium while our new house was being built. In 1988, we moved into our new house.
5. From that time on, William J. McGovern did all the things a father should do for his child. He clothed me, fed me, kept me safe, provided financial support, disciplined me, guided me, and mentored me.
6. As a firefighter, my stepfather worked 24 hours on then 24 hours off. This allowed him to be home often when I was home from school and allowed us to develop a deep bond. He was instrumental in helping me with homework assignments throughout my school years.

7. From the time I was in fourth grade I called my stepfather "dad" and thought of him as my real father. My friends referred to him as my dad. He called me "son" and referred to me as his son among other people.

8. My stepfather became my best friend.

9. My stepfather taught me how to play sports and spent countless hours playing catch with me. He coached my little league baseball and basketball teams.

10. My stepfather shared baseball season tickets to the New York Mets with several other firefighters and he would take me to approximately 10 games a season when I was a child.

11. My stepfather taught me to drive a car. He first tried to teach me using a standard transmission but I could not get the hang of a stick shift so he obtained a car with an automatic transmission and taught me how to drive that.

12. When I went off to college following high school, my biological father was required to pay half of my college tuition. Because my biological father did not do so, my stepfather paid my father's share.

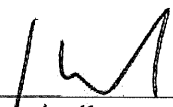
13. While attending college, I returned home for the summers and holidays and lived with my mother and stepfather in our family home.

14. My stepfather always stressed the importance of learning the art of public speaking. I know he was proud of me when I spoke to a large audience at the dedication of the naming of a street in his honor.

15. William J. McGovern was my father in all ways but name.

I declare under penalty of perjury the foregoing is true and correct.

Date: 8-3-19

  
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John Cuccinello